

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In Re:	)	BK No. 20-16002
JOSEPH TELUCH	)	
	)	
	)	Chapter 13
	)	Honorable: Donald R. Cassling
	)	
Debtors(s)	)	

**AGREED ORDER CONDITIONING THE AUTOMATIC STAY**

This matter coming to be heard upon the Motion of the Creditor, Town Square Condominium Association (hereinafter known as "Town Square"), for relief from the Automatic Stay, and the Court being informed that the Parties are in agreement as to the below terms:

IT IS HEREBY ORDERED THAT the Automatic Stay shall remain in effect conditioned upon the following:

1. As of September 28, 2022, the post filing delinquency (hereinafter known as "post filing delinquency") owed to Town Square is \$8,138.25.
2. The debtor shall pay current assessments and the post filing delinquency directly to Town Square by on line payments directly to Town Square as follows:
  - (a) The sum of \$1,000.00 by September 30, 2022 which shall be applied to the current regular monthly assessment due for October 1, 2022 with the balance applied to the post filing delinquency.
  - (b) The sum of \$1,000.00 by October 14, 2022 which sum shall be applied to the post filing delinquency.
  - (c) The sum of \$1,000.00 by October 28, 2022 which shall be applied to the current regular monthly assessment due for November 1, 2022 with the balance applied to the post filing delinquency.
  - (d) Additional payments of \$1,000.00 shall be paid by the 28<sup>th</sup> day of each month commencing on November 28, 2022 and applied to the then current regular monthly assessment with the balance to the post filing delinquency until the post filing delinquency is paid in full whereupon Debtor shall continue to make his regular monthly assessment payments by the 28<sup>th</sup> day of the month to Town Square.
  - (e) Nothing in this repayment plan is intended to modify any plan payments made by the Chapter 13 Trustee to Town Square for prefilling assessment delinquencies.

3. Should Debtor fail to timely pay any one post-petition assessment payment due Town Square, Town Square may serve a Notice of Default by email on his counsel at [cutlerfilings@gmail.com](mailto:cutlerfilings@gmail.com) and the Trustee. The Debtor shall then have seven (7) days from the date of service of the notice on his counsel and Trustee within which to cure the existing default set forth in such Notice.
4. If the Debtor fails to make such cure, then on the eighth (8) day after service of said Notice, the Automatic Stay in this cause shall be modified as to Town Square pursuant to 11 U.S.C. §362 upon the filing of a Notice of Modification with the Court, without further Order of the Court or proceeding being needed.
5. In the event a notice of Default is appropriately issued pursuant to the terms set forth above, the Debtor shall pay an additional \$150.00 as attorney fees for its issuance and shall tender said amount along with the default cure alleged therein in order to fully satisfy the Notice.

Agreed to:

/s/ Michelle Mandroiu, Esq.  
Attorney for Debtor, Joseph Teluch

Agreed to:

/s/ Joel S. Hymen  
Attorney for Creditor,  
Town Square Condominium Association

Enter:



Honorable Donald R. Cassling  
United States Bankruptcy Judge

Dated October 06, 2022

Prepared by:

Joel S. Hymen  
Hymen & Blair, P.C.  
1411 McHenry Road  
Suite 125  
Buffalo Grove, IL 60089  
847-276-2790 Fax 847-276-2792  
[jhymen@jhymenlaw.com](mailto:jhymen@jhymenlaw.com)  
ARDC NO. 3128041